

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re:)	Chapter 11
)	
BETTINA COOPER)	Case No. 07-13119
)	
Debtor.)	Judge Pamela Hollis
)	
)	Hearing: 03/10/09 at 10 a.m.

NOTICE OF MOTION

To: See Attached Service List

PLEASE TAKE NOTICE that on **March 10, 2009 at 10:00 A.M.**, the undersigned will appear before the Honorable Pamela Hollis, Bankruptcy Judge, in Courtroom 644, Dirksen Federal Building, 219 S. Dearborn, Chicago, Illinois, the Bankruptcy Court for the Northern District of Illinois, Eastern Division, and shall then and there present DEBTOR'S MOTION TO REOPEN CASE, a copy of which is enclosed herewith and served upon you.

/s/ Forrest L. Ingram

Forrest L. Ingram, #3129032

Peter L. Berk

Patrick F. Lambe

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CERTIFICATE OF SERVICE

I, Gautham Kaveti, an attorney, certify that I have served a true and correct copy of the above and foregoing notice and the document to which it refers on those whose names appear on the Service List attached below, by electronic notice through ECF or via U.S. Mail, postage prepaid, before the hour of 5 p.m., on February 26, 2009.

/s/ Gautham Kaveti

SERVICE LIST

By ECF Notice:

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Park National Bank

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as servicer for Nissan - Infiniti LT

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Nissan Infiniti LT

John F. Torres

Law Offices of John F. Torres
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Via U.S. Mail:

Debtor

Bettina Cooper
904 Willow Road
Matteson, IL 60443

Cook County Treasurer

PO BOX 4488
Carol Stream, IL 60197-4488

Cook County Treasurer

PO BOX 4488
Chicago, IL

Internal Revenue Service

230 S. Dearborn Street
Suite 3030
Chicago, IL 60604

Illinois Dept. of Revenue

Bankruptcy Section Level 7-425
100 West Randolph St.
Chicago, IL 60601

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DEBTOR'S MOTION TO REOPEN CASE

NOW COMES the Debtor's Counsel FORREST L. INGRAM, P.C., ("Debtor's Counsel"), pursuant to 11 U.S.C. § 350(b) and Bankruptcy Rule 5010, and moves this Honorable Court to re-open Debtor Bettina Cooper's ("Debtor") bankruptcy case for the specific purpose of filing Debtor's Counsel's Final Application for Compensation for Services and for Reimbursement of Expenses ("Final Application"). In support thereof, Debtor's Counsel states as follows:

1. On October 1, 2007, Debtor's Chapter 13 case was converted to a Chapter 11 case.
2. On October 23, 2007, the Court entered an order allowing the Debtor to Engage Forrest L. Ingram, P.C. as her bankruptcy counsel pursuant to an Engagement Agreement with Debtor's Counsel dated September 26, 2007.
3. On January 6, 2009, the Debtor's Chapter 11 case was dismissed.
4. On January 13, 2009, the case was closed, pursuant to the dismissal.
5. Debtor's Counsel has prepared its Final Application to be filed contemporaneously with this Motion to Reopen.
6. Under 11 U.S.C. § 350(b), "a case may be reopened in the court in which such case was closed to administer assets, to accord relief to the debtor, or for other cause."

7. Debtor's Counsel has cause to reopen this case because it was not able to file its Final Application prior to the case being closed.
8. Debtor's Counsel's request to re-open the case is not brought to prejudice any parties, but merely to be compensated reasonable fees for services provided and reasonable expenses for costs incurred in Debtor's chapter 11 case.

WHEREFORE, Debtor's Counsel respectfully requests that the Court reopen Debtor's bankruptcy case so that Debtor's Counsel may have its Final Application for Compensation for Services and Reimbursement of Expenses heard, and reimburse the Debtor's Counsel for the Reopening Fee because there is only one matter to be heard. Debtor's Counsel also respectfully requests for such other relief that may be just.

Respectfully submitted,
FORREST L. INGRAM, P.C.

By: /s/ Forrest L. Ingram

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